

UNITED STATES DISTRICT COURT

United States of America

v.

Kevin Alan Glass,

Defendant(s)

for the

Central District of California

FILED
CLERK, U.S. DISTRICT COURT

May 25, 2022

CENTRAL DISTRICT OF CALIFORNIA
BY: **MR** DEPUTY

LODGED
CLERK, U.S. DISTRICT COURT

5/25/2022

CENTRAL DISTRICT OF CALIFORNIA
BY: **VAM** DEPUTY

Case No. 2:22-mj-02078-DUTY

CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of April 19, 2019, in the county of Los Angeles in the Central District of California, the defendant violated:

Code Section

18 U.S.C. § 1542

Offense Description

False Statement in Passport Application

This criminal complaint is based on these facts:

Please see attached affidavit.

Continued on the attached sheet.

/s/ Kevin Coffey

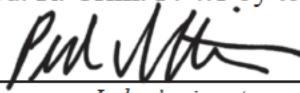
Complainant's signature

Kevin Coffey, DSS Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: May 25, 2022



Judge's signature

City and state: Los Angeles, California

Hon. Pedro V. Castillo, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Kevin Coffey, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against KEVIN ALAN GLASS ("GLASS") for a violation of Title 18, United States Code, Section 1542 (Passport Fraud).

2. The facts set forth in this affidavit are based upon my personal observations; my training and experience; and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only, and all dates are approximate.

II. BACKGROUND OF SPECIAL AGENT COFFEY

3. I am a Special Agent with the United States Department of State, Diplomatic Security Service ("DSS"), currently assigned to the Los Angeles Field Office. I have been employed as a Special Agent since 2021. My duties include conducting passport and visa fraud investigations.

4. I completed the Federal Law Enforcement Training Center's Criminal Investigator Training Program and the Diplomatic Security Center's Basic Special Agent Course where I

received specialized training in conducting investigations of federal offenses including passport fraud, visa fraud, and identity fraud.

III. SUMMARY OF PROBABLE CAUSE

5. In April 2019, GLASS submitted a U.S. passport application purporting to be M.D.M. at a post office in Long Beach, California. At the time, GLASS had an outstanding warrant for attempted murder. GLASS fled to the Dominican Republic and was arrested there in November 2020.

6. In October 2020, DSS agents interviewed M.D.M. and his mother, J.M. Both M.D.M. and J.M. reviewed the photograph submitted in connection with the April 2019 passport application and identified the individual as GLASS, who had been an acquaintance of M.D.M.'s. M.D.M. stated that he did not know how GLASS obtained his identity documents and that he did not give GLASS permission to use his identity or to submit a passport application in his name.

IV. STATEMENT OF PROBABLE CAUSE

7. Based on my review of law enforcement reports, conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

A. In March 2018, the West Covina Police Department Obtained an Arrest Warrant for GLASS for Attempted Murder

a. According to reports from West Covina Police Department officers:

b. On March 28, 2018, GLASS broke into his ex-girlfriend's residence, assaulted her, and then fled.

c. That same day, West Covina Police officers obtained an arrest warrant against GLASS for attempted murder, in violation of California Penal Code Sections 187 and 664; burglary, in violation of California Penal Code Section 459; robbery, in violation of California Penal Code Section 211; domestic violence causing visible injury, in violation of California Penal Code Section 273.5; and criminal threats, in violation of California Penal Code Section 422.

B. In April 2019, GLASS Submitted a U.S. Passport Application Using Another Person's Identity

8. Based on my review of Department of State records, I know the following:

a. On April 19, 2019, an individual (later identified as GLASS) submitted a Form DS-11, Application for a United States Passport in M.D.M.'s name at the United States Post Office in Long Beach, California (the "2019 Application").

b. In the 2019 Application, GLASS represented himself as a U.S. Citizen, swore under oath to the acceptance clerk that the information in the passport application was a true likeness of him, and signed the application in the presence of an acceptance clerk.

c. As proof of identity and citizenship, GLASS presented a California driver's license and California birth certificate with M.D.M.'s real personal identifying information.

9. A fraud manager referred the 2019 Application to the DSS in Los Angeles because some of the information presented in the application did match the information submitted in a

previous passport application in M.D.M.'s name on August 8, 2013, to the Charleston Passport Center (the "2013 Application"). Specifically, the fraud manager identified the following discrepancies:

a. The passport photograph that was submitted with the 2019 Application did not match the photograph that was submitted with the 2013 Application. Nor did the passport photograph in the 2019 Application in M.D.M.'s name appear to match a California DMV photograph of M.D.M.

b. Facial recognition software linked the photograph that was submitted as part of the 2019 Application to GLASS, who had applied for and received a U.S. Passport in his own name in 2010 (the "2010 Application").

c. The handwriting on the 2010 Application in GLASS's name appeared to resemble the handwriting on the 2019 Application in M.D.M.'s name.

d. Although the 2019 Application stated that M.D.M. had never applied for a passport before, a passport card was issued to M.D.M. based on the 2013 Application.

e. The mailing address listed on the 2019 Application was linked to a commercial location, not a residential area or post office. Law enforcement database checks of the address history of M.D.M. confirmed that the mailing address was not associated with M.D.M.

f. The signature on the 2019 Application in M.D.M.'s name did not appear to match the signature on the 2013 Application in M.D.M.'s name.

C. M.D.M. and J.M. Identify GLASS as the Individual Depicted in the 2019 Application

10. Based on my review of law enforcement reports and written witness statements, I know the following.

11. On October 18, 2020, DSS agents interviewed J.M., who was listed as M.D.M.'s mother on both the 2019 Application and 2013 Application in M.D.M.'s name.

a. J.M. confirmed that the photograph submitted with the 2013 Application was her son, M.D.M.

b. J.M. identified the photograph submitted with the 2019 Application as M.D.M.'s friend, "Kevin," which is GLASS's first name.

12. On October 18, 2020, DSS agents interviewed M.D.M.

a. M.D.M. confirmed that the applicant in the 2019 Application was his friend, GLASS, and not him.

b. M.D.M. stated he was unaware of how GLASS acquired his identity documents and never would have given GLASS permission to use his identity.

c. M.D.M. further stated that several discrepancies had been found on his credit report.

D. In May 2022, GLASS Applied for a U.S. Passport at the El Paso Passport Center

13. Based on my review of law enforcement reports and conversations with law enforcement agents, I know the following:

14. On November 12, 2020, United States Marshal Service and DSS agents arrested GLASS in the Dominican Republic. At the time of his arrest, GLASS had a fraudulent New York driver's license on him.

15. On January 28, 2022, according to law enforcement databases, GLASS was convicted of two counts of inflicting corporal injury on a domestic partner, in violation of California Penal Code Section 273.5(a), in the Superior Court for the State of California, County of Los Angeles, Case No. XEAKA1779801.

16. On May 24, 2022, according to Department of State records, GLASS submitted a U.S. Passport application at the El Paso Passport Center in El Paso, Texas (the "2022 Application"). GLASS applied for the passport in his own name.

17. In response to a question on the 2022 Application that required GLASS to "List all other names you have used," GLASS did not list any other names.

V. CONCLUSION

18. For all of the reasons described above, there is probable cause to believe that GLASS has committed a violation of Title 18, United States Code, Section 1542 (Passport Fraud).

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 25th day of May,
2022.



THE HONORABLE PEDRO V. CASTILLO
UNITED STATES MAGISTRATE JUDGE